

August 12, 2011

P. O. Box 23490 San Jose, California 95153 (408) 227-9540

City of San José
Department of Planning, Building,
and Code Enforcement
Attention: John Davidson
200 East Santa Clara Street, 1st Floor
San José, CA 95113

RE: COMMENTS TO THE ENVISION SAN JOSE 2040 GENERAL PLAN

File No.: PP09-011 Council District: Citywide

Dear Mr. Davidson:

The following are the comments of Great Oaks Water Company (Great Oaks) to the Envision San José 2040 General Plan (Plan). Should you have any questions, please contact the undersigned.

General Comments

These comments are primarily directed to water supply issues and, more particularly, to the Water Supply Assessments included in Appendix I of the Plan. But it is also necessary to comment on the speculative and theoretical nature of the Plan itself.

The City of San José has engaged in various planning processes over the years. Among those efforts have been plans detailing proposed development in the Coyote Valley area, none of which have come to fruition or even gone beyond the drawing board. The Plan includes proposed development in the Coyote Valley area again. If history is any indication of eventual success in planning activities, the Plan's proposals for Coyote Valley are not likely to become reality.

In the context of Water Supply Assessments for the Plan, the probably that the Plan will not mirror eventual reality must be considered. Water Supply Assessments for the Coyote Valley area submitted for the Plan will most likely be completely obsolete when or if development takes place in Coyote Valley. The law will require new Water Supply Assessments in that event. Great Oaks will provide any required Water Supply Assessments at that time.

Comments to Plan Discussion of Water Utility Services

The Plan's discussion of groundwater basins (beginning at page 324) is incorrect. According to the California Department of Water Resources, there is no Coyote Valley Sub-basin of the Santa Clara Valley Groundwater Basin, yet the Plan makes specific reference to a Coyote Valley Sub-basin.

Much of the Plan is based upon Urban Water Management Plans that were prepared for 2005 and are now obsolete. Great Oaks' 2010 Urban Water Management Plan is attached hereto and incorporated into these comments.

The Plan's discussion of the regulatory framework (beginning at page 634) makes no reference to the California Public Utilities Commission (CPUC) which regulates the vast majority of the water service currently provided within the City of San José. This omission is significant, as the CPUC is increasing its presence in areas pertinent to the Plan, including water conservation.

Comments to City of San José Water Supply Assessment

Service Area Issues

The Plan contemplates development within Great Oaks' service area. It is and will be unlawful for the City to provide water service in Great Oaks' service area. Any such action would likely result in significant and prolonged litigation. The City's Water Supply Assessment does not address these factors.

The Water Supply Assessment for the City of San José does not address the financial condition of the City itself, which is and will likely continue to be a major obstacle to expansion of the City's Municipal Water System. The minimal water supply assets the City currently has in place are admittedly insufficient to provide adequate water supplies for development in Coyote Valley. The failure to address the fiscal issues is not insignificant.

Great Oaks' 2010 Urban Water Management Plan (UWMP) (attached and incorporated into these comments by reference) evidences Great Oaks' ability to provide water service to the areas of proposed development under Plan scenarios.

Non-Potable Water Issues

The City's Water Supply Assessment appropriately states that recycled water use for irrigation is not planned for Coyote Valley due to environmental concerns. Those environment concerns are not limited to the use of recycled water for irrigation in Coyote Valley. Environmental concerns exist for <u>all</u> uses of recycled water to the extent that the recycled water will contaminate groundwater supplies if permitted to enter surface water

or groundwater supplies. Recent experiments on the expanded use of recycled water indicate a very high risk of groundwater contamination. The City's Water Supply Assessment inadequately addresses this important environmental and water supply issue.

Water Supply

Highlighting the inadequacy of the City's Water Supply Assessment is the discussion of Coyote Valley water supplies. The groundwater wells referenced cannot provide adequate water supplies for the Plan. More wells would be required and the financial ability of the City to fund expansion of its Coyote Valley water system assets is questionable. No infrastructure currently exists to supply treated water in Coyote Valley. Expanded use of recycled water presents a high environmental risk. And any expanded use of recycled water in Coyote Valley would require massive financial investment by government agencies that presently lack the necessary financial resources for that investment.

The City's Water Supply Assessment makes reference to the Santa Clara Valley Basin and two so-called sub-basins located therein, the Santa Clara Sub-basin and the Coyote Valley Sub-basin. The California Department of Water Resources does <u>not</u> recognize the existence of a Coyote Valley Sub-basin, but instead includes groundwater in Coyote Valley to be within the Santa Clara Sub-basin of the Santa Clara Valley Basin. The City's Water Supply Assessment is factually inaccurate in this regard and is apparently based upon obsolete and outdated information.

Reference is made in the City's Water Supply Assessment to the need for additional Coyote Valley wells to provide the necessary water supplies for the Plan. Reference is also made to the issue of water rights and that the Santa Clara Valley Groundwater Basin is not an adjudicated basin. To the extent that new wells established by the City would interfere with Great Oaks water supply, it may be necessary to initiate basin adjudication proceedings. The City's Water Supply Assessments fails to take this factor into account.

Water Resources Management

The City's Water Supply Assessment makes no mention of the probable changes to the Santa Clara Valley Water District's groundwater recharge facilities in Coyote Valley. These likely changes may negatively affect the City's existing wells in that region. This omission makes the City's Water Supply Assessment inadequate.

Comments to San Jose Water Company Water Supply Assessment

The Water Supply Assessment submitted by San Jose Water Company (SJWC) is generally consistent with its 2010 Urban Water Management Plan. As SJWC does not position itself as a water service provider for the Coyote Valley or any other portion of Great Oaks' service area, Great Oaks has no additional comments for SJWC's Water Supply Assessment.

Closing Comments

The Plan is the most recent in a series of plans for the City of San José. When, or if, elements of the Plan affecting Great Oaks come to fruition, Great Oaks will provide updates to its ability to provide water service.

Great Oaks Water Company

Timothy S. Guster

Vice President and General Counsel

Legal and Regulatory Affairs

Attachment: Great Oaks Water Company 2010 Urban Water Management Plan



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Proof of Publication Corporate Resolution Adopting 2010 Urban Water Management Plan





Executive Summary

Great Oaks Water Company (Great Oaks) was founded in 1959 and has provided high quality water service to its customers for more than half a century. All of the water served by Great Oaks is sourced from the abundant underground water supplies in the Santa Clara Valley Groundwater Basin. Due to Great Oaks' management, Great Oaks customers receive great tasting water at the lowest California Public Utilities Commission (CPUC) rates in the County.

This Urban Water Management Plan (UWMP) complies with all legal requirements, including the requirements of the Water Conservation Bill of 2009 (including SBX7-7) that call for a statewide reduction in urban water use of 20% by the year 2020.

Great Oaks has analyzed its sources of water during normal and dry years and has concluded that it will have sufficient water available to meet demand projections through the year 2035. Great Oaks expects and will require the Santa Clara Valley Water District to comply with all legal requirements and responsibilities pertaining to the Santa Clara Valley Groundwater Basin during this period of time.



ı. Introduction

Great Oaks has prepared this Urban Water Management Plan (UWMP) in accordance with the California Urban Water Management Planning Act (Water Code Division 6, Part 2.6, Sections 10610 through 10657). This is an update to Great Oaks' 2005 UWMP and provides new and detailed information required by the Water Conservation Bill of 2009. Included within this UWMP is information on water use and conservation as required by SBX7-7 which, generally, requires a statewide 20% reduction in water use by the year 2020.





II. **Public Participation**

Applicable Law A.

Water Code Section 10642

Each urban water supplier shall encourage the active involvement of diverse social, cultural, and economic elements of the population within the service area prior to and during the preparation of the plan. Prior to adopting a plan, the urban water supplier shall make the plan available for public inspection and shall hold a public hearing thereon. Prior to the hearing, notice of the time and place of hearing shall be published within the jurisdiction of the publicly owned water supplier pursuant to Section 6066 of the Government Code. The urban water supplier shall provide notice of the time and place of hearing to any city or county within which the supplier provides water supplies. A privately owned water supplier shall provide an equivalent notice within its service area. After the hearing, the plan shall be adopted as prepared or as modified after the hearing.

В. **Public Participation**

Great Oaks has actively encouraged community participation in its urban water management planning efforts since the first plan was adopted in 1985. Public meetings were held for the 1985, 1990, 1995, 2000, 2005 and 2010 plans.

For the 2010 Urban Water Management Plan, a public meeting was held on June 30, 2011 at the Great Oaks offices. Public comments and opinions were solicited for review and comment on the draft plan before the plan was adopted by the company's Board of Directors.

Notice of the public meeting was published in the San Jose Mercury News on April 29, 2011 and also on May 6, 2011. Copies of the draft plan were made available at Great Oaks' offices prior to the public meeting. A copy of the public meeting notice is included in the Appendix.

C. Plan Adoption

Great Oaks prepared this update of its Urban Water Management Plan during the last quarter of 2010 and the first quarter of 2011. The updated Plan was adopted by the Great Oaks Board of Directors on June 30, 2011. The Plan will be submitted to the California Department of Water Resources on or before July 31, 2011. The Appendix of the Plan includes a true and accurate copy of the Corporate Resolution of Urban Water Management Plan Adoption. This Plan includes all information necessary to fulfill the requirements of the California Water Code.





Agency Coordination III.

A. Applicable Law Water Code Section 10620(d)(2)

Each urban water supplier shall coordinate the preparation of its plan with other appropriate agencies in the area, including other water suppliers that share a common source, water management agencies, and relevant public agencies, to the extent practicable.

Coordination with Appropriate Agencies

The vast majority of Great Oaks' service area is within the City of San Jose. Two other water utilities, San Jose Water Company (SJWC) and San Jose Municipal Water System (SJMWS), also provide water service within the City of San Jose and, to the extent SJWC and SJMWS utilize the Santa Clara Valley Groundwater Basin (DWR Bulletin 118 Groundwater Basin Number 2-9) as a source of supply, Great Oaks shares a source of supply with those utilities. The Santa Clara Valley Water District (SCVWD) is the local water management agency responsible for groundwater management; however, SCVWD is not a water utility and does not supply water to Great Oaks.

Great Oaks, SJWC and SJMWS are regular members of the SCVWD Retailer Committee and Water Supply, Water Conservation and Groundwater Subcommittees. Great Oaks regularly attends and participates in these committee and subcommittee meetings and receives electronic email updates on committee and subcommittee activities and reports throughout each year. Urban Water Management Plans have been discussed at such meetings in advance of the submission date for 2010 Urban Water Management Plans, and Great Oaks considers such discussions to be participation in the development of this UWMP. Great Oaks also attended and participated in a workshop devoted to Urban Water Management Plan preparation conducted by the California Department of Water Resources (DWR) held at SCVWD in February 2011. Table 1 provides further information regarding Great Oaks' coordination with appropriate agencies.

Table 1 - Coordination with Appropriate Agencies

Coordinating Agencies	Participated/Invited to Participate in developing Plan	Commented on Draft Plan	Attended Public Meetings	Contacted For Assistance	Sent/Made Available copy of Draft Plan	Sent Notice of Intention to Adopt	Not Involved Or No Information
SJWC	X				X	×	
SJMWS	х				x	x	
SCVWD	х				X	X	
General Public	х				x	×	





IV. Supplier Service Area

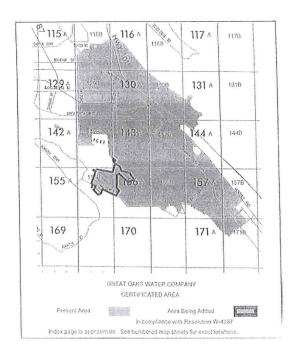
A. Applicable Law Water Code Section 10631

A plan shall be adopted in accordance with this chapter that shall do all of the following:

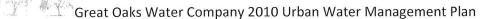
Describe the service area of the supplier, including current and projected population, climate, and other demographic factors affecting the supplier's water management planning. The projected population estimates shall be based upon data from the state, regional, or local service agency population projections within the service area of the urban water supplier and shall be in five-year increments to 20 years or as far as data is available.

B. Description of Service Area

Great Oaks' service area is as authorized by the CPUC. Presently, Great Oaks' CPUC-authorized service area is reflected on Great Oaks' Tariff Sheet No. 493-W and is as shown below.



Generally, Great Oaks' service area includes a portion of the southern end of the City of San Jose known as the Edenvale, Blossom Valley, SE Almaden Valley and Coyote Valley area. Snell Avenue roughly bound the area on the West, the Silver Creek Ridge on the East, Palm Avenue (in Coyote Valley) on the South and Riverview Drive on the North.



Historically, the City of San Jose has infringed upon Great Oaks' CPUC-authorized service area and such action by the City of San Jose has been the subject of litigation. No litigation is pending as of the date of this Plan. This Plan is prepared based upon the assumption that the City of San Jose will not further infringe upon Great Oaks' CPUC-authorized service area. Growth projections are based upon the assumption that Great Oaks will be the water service provider to its entire CPUC-authorized service area and the logical and approved extensions thereto.

C. Climate

According to the United States Department of Commerce, National Oceanographic and Atmospheric Administration ("NOAA"):

San Jose's latitude and location on the west coast of North America place the city in a Mediterranean type climate. This classification is mainly identified by sharply contrasting wet and dry seasons. The wet season runs from November through March. 82% of the yearly precipitation total falls within this period. Rainfall is sparse from May through October. Rain during the summer months of June, July and August normally totals only 0.20". Wet seasons are cool, but mild. Dry season weather is very consistent, with warm sunny days.

D. Current and Projected Population

Great Oaks has estimated the population of its service area using the Alternative Methodology for Service Area Population provided in Appendix A of DWR's Methodologies for Calculating Baseline and Compliance Per Capita Water Use.

Based upon this methodology, the 2010 population in Great Oaks' CPUC-authorized service area is calculated to be 92,995. The Association of Bay Area Governments (ABAG) has projected population growth to be modest in the future, growing at a rate of 1.1 to 1.5% per year. Table 2 shows the Current and Projected Population in Great Oaks' CPUC-authorized service area based upon a projected 1.3% growth per year.

Table 2 - Population of Great Oaks' Service Area

2005	2010	2015	2020	2025	2030	2035
91,273	92,995	99,199	105,817	112,878	120,407	128,439

In recent years, the City of San Jose has engaged in various planning activities in an apparent effort to control development in the undeveloped areas of the City and in contiguous unincorporated areas of Santa Clara County. At the time Great Oaks prepared its 2005 UWMP, the City had planned for development in Coyote Valley, a geographic area already partially included within Great Oaks' CPUC-authorized service area and comprising the natural and logical extensions of Great Oaks' CPUC-authorized service area (generally) to the South. In the years since the submission of the 2005 UWMP, the City's planning efforts have changed direction, and those planning efforts will likely change direction one or more times in the coming years depending upon



factors including politics, the economy, availability of natural resources, including water, and population growth. Great Oaks is capable and well-positioned to provide water service within its CPUC-authorized service area and the natural and logical extensions thereto under numerous development scenarios, including high-growth, high density planned communities, as were envisioned in 2005.

In the past two years, two large multi-family residential and/or mixed use (residential and commercial) projects in Great Oaks' service area have been the subject of water supply assessments requested of and submitted by Great Oaks. If both projects go forward, then as many as 4,400 residential living units may be added to the population in Great Oaks' service area. This has the potential of increasing the residential population in Great Oaks' service area by more than 15,000. It is not known at this time precisely how many additional service connections will be added if these projects move forward and are completed, but a reasonable estimate is that 500 service connections (a combination of single-family and multi-family service connections) will be added. It is expected that with the new construction, water use appliances and landscaping water uses will be modern and highly efficient.





V. System Demands

A. Historical and Current Demands

Great Oaks provides water service to several classes of customers: single-family residential; multi-family residential; business; industrial; public authorities; schools; private landscapes; and agriculture. Agriculture water sales are not included in this analysis. In addition, Great Oaks provides water for public and private fire protection throughout its service area. All of Great Oaks' customers have metered service.

Table 3A, below, shows historical and current deliveries within Great Oaks' service area by customer class per acre foot (AF). Table 3B displays the same data per million gallons (MG).

Table 3A – Water Sales by Customer Class (AF)

		,	
Customer Class	2000	2005	2010
Single-Family Residential	7,994	7,577	6,693
Multi-Family Residential	1,654	1,700	1,605
Business	786	819	795
Industrial	424	264	212
Public Authorities	457	353	313
Schools	424	430	350
Private Landscapes	681	648	568
Totals	12,420	11,791	10,536

Table 3B – Water Sales by Customer Class (MG)

Customer Class	2000	2005	2010
Single-Family Residential	2,605.33	2,468.70	2,180.90
Multi-Family Residential	538.78	553.85	522.94
Business	255.92	267.23	259.41
Industrial	138.37	86.29	69.49
Public Authorities	149.19	114.54	101.85
Schools	138.09	140.15	113.77
Private Landscapes	222.08	211.30	184.65
Totals	4,047.76	3,842.06	3,433.01



Table 4A shows actual water deliveries in 2010 measured in AF; Table 4B shows actual water deliveries in 2010 measured in MG (Million Gallons).

Table 4A – Actual Water Deliveries 2010 (AF)

Water Use Sectors	# of accounts	Volume (AF)	Unmetered	Totals
Single-Family Residential	19,456	6,693	NA	6,693
Multi-Family Residential	475	1,605	NA	1,605
Business/Commercial	292	795	NA	795
Industrial	46	212	NA	212
Public Authority	145	313	NA	313
Schools	34	350	NA	350
Private Landscape	174	568	NA	568
Total	20,625	10,536	NA	10,536

Table 4B – Actual Water Deliveries 2010 (MG)

Water Use Sectors	# of accounts	Volume (MG)	Unmetered	Totals
Single-Family Residential	19,456	2,180.90	NA	2,180.90
Multi-Family Residential	475	522.94	NA	522.94
Business/Commercial	292	259.41	NA	259.41
Industrial	46	69.49	NA	69.49
Public Authority	145	101.85	NA	101.85
Schools	34	113.77	NA	113.77
Private Landscape	174	184.65	NA	184.65
Total	20,625	3,433.01	NA	3,433.01

В. Projected Water Demand

Great Oaks' account numbers have increased by 1.01% over the five-year period ending 2009. On average, account numbers during this period of time have increased at 0.2% annually. During this same period of time, water usage declined by 4.18%, for an average decline of 0.84% per year. Additional accounts for the projects referenced in Section IV.D., above, are not included in these projections. Clearly, however, when supply is compared to demand (Section VII.I., below), Great Oaks has sufficient supply to meet demand even when an additional 15,000 residents (with 500 new service connections) are included. Projected account numbers and volume water deliveries for 2015 and beyond are listed in Tables 5, 6 and 7, below.



Table 5A – Projected Water Deliveries in 2015 (AF)

Water Use Sectors	# of accounts	Volume (AF)	Totals
Single-Family Residential	19651	6,411	6,411
Multi-Family Residential	480	1,538	1,538
Business/Commercial	295	764	764
Industrial	46	206	206
Public Authority	146	301	301
Schools	34	335	335
Private Landscape	176	543	543
Total	20,828	10,098	10,098

Table 5B – Projected Water Deliveries in 2015 (MG)

Water Use Sectors	# of Accounts	Volume (MG)	Totals
Single-Family Residential	19651	2,089.74	2,089.74
Multi-Family Residential	480	501.07	501.07
Business/Commercial	295	248.56	248.56
Industrial	46	66.58	66.58
Public Authority	146	97.59	97.59
Schools	34	109.01	109.01
Private Landscape	176	176.93	176.93
Total	20,828	3,289.48	3,289.48

Table 6A – Projected Water Deliveries in 2020 (AF)

Table OA Trojected Water Benvenes III 2020 (NI)					
Water Use Sectors	# of Accounts	Volume (AF)	Totals		
Single-Family Residential	19,847	6,144	6,144		
Multi-Family Residential	485	1,473	1,473		
Business/Commercial	298	730	730		
Industrial	47	196	196		
Public Authority	148	288	288		
Schools	35	319	319		
Private Landscape	177	522	522		
Total	21,037	9,672	9,672		

Table 6B - Projected Water Deliveries in 2020 (MG)

Water Use Sectors	# of Accounts	Volume (MG)	Totals
Single-Family Residential	19,847	2,002.39	2,002.39
Multi-Family Residential	485	480.14	480.14
Business/Commercial	298	238.17	238.17
Industrial	47	63.80	63.80
Public Authority	148	93.51	93.51
Schools	35	104.46	104.46
Private Landscape	177	169.53	169.53
Total	21,037	3,152	3,152



Table 7A - Projected Water Deliveries 2025 - 2035 (AF)

Table 111 111 John St.						
Water Use	2025	2025	2030	2030	2035	2035
Sector	Accounts	Volume	Accounts	Volume	Accounts	Volume
Single-Family	20,046	5,889	20,246	5,641	20,448	5,407
Multi-Family	489	1,412	494	1,353	499	1,295
Business	301	865	304	672	307	644
Industrial	47	187	48	181	48	172
Public Authority	149	276	151	264	152	252
Schools	35	307	35	295	36	282
Private Landscaping	179	497	181	479	183	457
Total	21,246	9,433	21,459	8,885	21,673	8,509

Table 7B- Projected Water Deliveries 2025-2035 (MG)

	Table 78 Trojected Water 2 all area 2000 ()							
Water Use	2025	2025	2030	2030	2035	2035		
Sector	Accounts	Volume	Accounts	Volume	Accounts	Volume		
Single-Family	20,046	1,918.69	20,246	1,838.49	20,448	1761.64		
Multi-Family	489	460.07	494	440.84	499	422.41		
Business	301	282.22	304	218.68	307	209.54		
Industrial	47	61.13	48	58.58	48	56.13		
Public Authority	149	89.60	151	85.86	152	82.27		
Schools	35	100.09	35	95.91	36	91.90		
Private Landscaping	179	162.45	181	155.66	183	149.15		
Total	21,246	2,994.25	21,459	2,894.02	21,673	2,773.04		

Approximately 1.5% of Great Oaks' single-family residential customers participate in Great Oaks' low-income assistance program. In 2010, it is estimated that Great Oaks' low-income customers accounted for 1.5% of the single-family residential water demand. Great Oaks has used this percentage of single-family residential water demand to calculate the low-income water demand through 2035. Great Oaks does not possess information regarding the number of low-income residents in multi-family residential units within Great Oaks' service area. The following Table 8 lists the projected water demand for single-family residential low-income customers.

Table 8 - Low Income Projected Water Demand (CCF)

Low Income Water Demands	2015	2020	2025	2030	2035
Single-Family Residential	41,907	40,155	38,476	36,868	35,327

Great Oaks does not presently sell water to outside agencies, although it does have a CPUC-authorized tariff should opportunities for such water sales occur. In the past several years, Great Oaks has offered to provide water to SCVWD in the event of an emergency situation that prevents SCVWD from delivering water from its water treatment facilities. The volume of water Great Oaks offered was up to 20 MG/day for the duration of the emergency (likely up to 30 days). The approximate total of 600 MG

(or 1,841 AF) is available from Great Oaks' supply. SCVWD has not responded favorably to Great Oaks' offer, and has instead pursued what it initially called its "Infrastructure Reliability Project" to create infrastructure and well fields to utilize groundwater in the event of emergency. SCVWD's projected costs are well above \$100 million, whereas the cost to accept Great Oaks' offer of emergency water supply would be a fraction of that amount. No water sales to other agencies are projected at this time.

Table 9 - Sales to Other Water Agencies

Water Distributed	2005	2010	2015	2020	2025	2030	2035
None	0	0	0	0	0	0	0

C. Additional Water Uses and Losses

On average over the past decade, approximately 4.4% of water produced from Great Oaks' groundwater wells is categorized as "unaccounted for water." Translating "unaccounted for water" to a percentage of total water produced is simply a method of producing a "snapshot" view of system losses. Using the historical percentage of "unaccounted for water" for future projections can be misleading, as, for example, the City of San Jose Fire Department performed very little hydrant flushing in 2010 due to drought concerns. Also, as water transmission mains and service connections age, actual water losses are expected to increase. For purposes of this projection, Great Oaks will use 2005 as the baseline and project an additional 50 AF in water losses every five years. The following table 10 lists the water losses represented by "unaccounted for water."

Table 10A - Additional Water Uses and Losses (AF/Year)

				The state of the s			
Water Use	2005	2010	2015	2020	2025	2030	2035
System Losses	543	485	593	643	693	743	793

Table 10B - Additional Water Uses and Losses (MG/Year)

Table 100 Additional Water Oses and Eosses (Me) reary									
Water Use	2005	2010	2015	2020	2025	2030	2035		
System Losses	176.83	158.00	193.23	209.52	225.82	242.11	258.40		



Tables 11A and 11B summarize Great Oaks' total projected water demand through 2035.

Table 11A – Total Water Demand (AF/Year)

Water Use	2005	2010	2015	2020	2025	2030	2035
Total Water					auri etteratului		
Deliveries	11,791	10,536	10,098	9,672	9,433	8,885	8,509
(Tables 3 – 7)							
Sales to							
Other	0	0	0	0	0	0	0
Agencies	0	0	Ŭ				
(Table 9)							
Additional							
Water Uses	543	485	593	643	693	743	793
And Losses	545	463	333	043	033	7-13	,33
(Table 10)							
Total	12,334	11,021	10,691	10,315	10,126	9,628	9,302

Table 11B – Total Water Demand (MG/Year)

Water Use	2005	2010	2015	2020	2025	2030	2035
Total Water							
Deliveries	3,842.06	3,433.01	3,289.48	3,152.00	2,994.25	2,894.02	2,773.04
(Tables 3 – 7)							
Sales to Other							
Agencies	0	0	0	0	0	0	0
(Table 9)							
Additional							
Water Uses	176.83	158.00	193.23	209.52	225.82	242.11	258.40
And Losses	170.63	158.00	193.23	203.32	223.02	2 12.11	230.10
(Table 10)							
Total	4,018.89	3,591.01	3,482.71	3,361.52	3,220.07	3,136.13	3,031.44

D. Retail Agency Demand Projections

Groundwater is Great Oaks' sole source of supply. The total water demand from the Santa Clara Valley Groundwater Basin for the years 2010 through 2035 is provided in Tables 12A and 12B, below.



Table 12A – Retail Agency Demand Projections (AF/Year)

	Tubic III		,			
Source of Supply	2010	2015	2020	2025	2030	2035
Santa Clara Valley Groundwater Basin	11,021	10,691	10,315	10,126	9,628	9,302

Table 12B - Retail Agency Demand Projections (MG/Year)

	TUDIC ILD	ite can i beneg				
Source of Supply	2010	2015	2020	2025	2030	2035
Santa Clara Valley						
Groundwater	3,591.01	3,482.71	3,361.52	3,220.07	3,136.13	3,031.44
Basin						



VI. **Baseline and Target Determination**

Each urban water retail supplier is required to include the following in its UWMP:

Baseline daily per capital water use – how much water is used within an urban water supplier's distribution system area on a per capita basis. It is determined using water use and population estimates from a defined range of years.

Urban water use target – how much water is planned to be delivered in 2020 to each resident within an urban water supplier's distribution system area, taking into account water conservation practices that currently are and plan to be implemented.

Interim urban water use target – the planned daily per capita water use in 2015, a value halfway between the baseline daily per capita water use and the urban water use target.

The Water Conservation Bill of 2009 requires a water supplier (like Great Oaks) to complete the following four steps to meet 2010 UWMP requirements:

- Step 1. Determine base daily per capita water use.
- Step 2. Determine urban water use targets.
- Step 3. Compare urban water use targets to a 5-year baseline.
- Step 4. Determine interim urban water use target.



Step 1

Great Oaks base period ranges are provided in Table 13, below.



Table 13 - Base Period Ranges

Base	Parameter	Value	AF	MG
10 – 15	2008 Total Water Deliveries	//	12,407	4,043.17
Year	2008 Total Volume of Delivered Recycled Water	//	0	0
Base	2008 Recycled Water as % of Total Deliveries	//	0	0
Period	Number of Years in Base Period	10	//	//
	Year Beginning Base Period Range	1999	//	//
	Year Ending Base Period Range	2008	//	//
5-year	Number of Years in Base Period	5	//	//
Base	Year Beginning Base Period Range	2004	//	//
Period	Year Ending Base Period Range	2008	//	//

Great Oaks has a base daily per capita water use of 120.637 gpcd for the 10-year range as shown in Table 14, below. The gross water use includes all potable metered water use. System population figures are based upon Great Oaks' service area population for this 2010 UWMP (Table 2), with an appropriate adjustment for 1999.

Table 14 - Base Daily per Capita Water Use (10-Year Range)

	Tuble 11 Buse Bully per suprite traces and first real traces								
Base Peri	iod Year	Distribution	Daily System	Annual Daily					
Sequence	quence Calendar Syste		Gross Water Use	Per capital water use					
Year	Year	Population	(MGD)	(gpcd)					
1	1999	89,588	10.846	121.065					
2	2000	90,768	11.111	122.411					
3	2001	91,060	11.318	124.292					
4	2002	91,060	11.225	123.270					
5	2003	91,116	11.048	121.252					
6	2004	91,104	11.197	122.904					
7	2005	91,273	10.526	115.324					
8	2006	91,998	10.677	116.057					
9	2007	92,215	11.135	120.750					
10	2008	92,796	11.047	119.046					
	Bas	se Daily Per Capita Water	Use	120.637					

Step 2

Urban water suppliers may use one or more of four methods to determine the urban water use target:

Method 1: 80% of base daily per capita water use

Method 2: Performance Standards Method 3: 95% of regional target

Method 4: Water Savings

Great Oaks has chosen to use Method 1 to determine its urban water use target.

80% of daily per capita water use = 96.510



Great Oaks' projected water demand in 2020 is 3,152 (MG) or 8.612.022 MGD. Based upon projected 2020 service area population of 105,817 (Table 2), Great Oaks projects that daily per capita water use in 2020 will be 81.386 gpcd, well below its urban water use target.

Step 3

To verify Great Oaks' urban water use target, a confirmation of a 5-year based daily per capita water use value is required. Table 15 shows Great Oaks' base daily per capita water use calculations for the 5-year range.

Table 15 - Base Daily per Capita Water Use (5-Year Range)

Base Per	iod Year	Distribution	Daily System	Annual Daily
Sequence	Calendar	System Population	Gross Water Use (MGD)	Per Capital Water Use (gpcd)
Year	Year		(IVIGD)	(Bbca)
Year 1	2004	91,104	11.197	122.904
Year 2	2005	91,273	10.526	115.324
Year 3	2006	91,998	10.677	116.057
Year 4	2007	92,215	11.135	120.750
Year 5	2008	92,796	11.047	119.046
	В	ase Daily Per Capita Water Use		118.816

Great Oaks' base daily per capita water use for the 5-year range is 118.816 gpcd. Ninety five percent (95%) of the daily per capita water use for the 5-year range is 112.875 gpcd. Great Oaks' urban water use target, based upon Method 1, is 96.510 gpcd, which is less than 95% of the 5-year base daily per capita water use calculated in Step 3. Great Oaks projects that it will meet both the Method 1 and Method 3 goals.

Step 4

Great Oaks' interim urban water use target is the water use goal Great Oaks is to achieve and report in its 2015 UWMP. This interim water use target is calculated as the average of Great Oaks' base daily per capita water use from Table 14 (120.637 gpcd) and Great Oaks' urban water use target (96.510 gpcd), or 108.574 gpcd.

Great Oaks' projected 2015 metered usage (Table 5B) is 3,289.48 MG, and its projected 2015 service area population (Table 2) is 99,199. Great Oaks' projected daily per capita water use in 2015 is 90.837 gpcd, which is lower than Great Oaks' interim urban water use target of 108.574 gpcd.





VII. Sources of Supply

Great Oaks owns and operates nineteen (19) groundwater wells located on property owned by Great Oaks. Great Oaks owns all water rights associated with and appurtenant to its properties.

All nineteen groundwater wells draw from the Santa Clara Valley Groundwater Basin (DWR Bulletin 118 Groundwater Basin Number 2-9). The Santa Clara Valley Groundwater Basin is an unadjudicated basin. The Santa Clara Valley Water District is statutorily responsible for managing the groundwater basin within its jurisdiction, including the Santa Clara Valley Groundwater Basin. The Santa Clara Valley Water District is believed to have adopted a groundwater management plan for the Santa Clara Valley Groundwater Basin. The Santa Clara Valley Water District is neither a water service provider nor a wholesale water provider to Great Oaks.

The Santa Clara Valley Water District may or may not adequately or properly manage the groundwater in the Santa Clara Valley Groundwater Basin. If not adequately or properly managed, the capacity of several of Great Oaks' groundwater wells may be reduced. In that event, Great Oaks has several options, including: shifting production from wells located in different geographic/hydrologic areas of Great Oaks' service area and purchasing or installing additional groundwater wells in different locations in the Santa Clara Valley Groundwater Basin to replace any loss of water production capacity. Great Oaks projections for water supply are based on its 2005 UWMP water supply projections for groundwater and are assumed to remain constant through 2035. This method ensures a conservative estimate of projected water supplies.

A. Current and Projected Water Supply

Great Oaks' current and projected water supply is detailed in Tables 16A and 16B, below.

Table 16 - Current and Projected Water Supply (AF/Year)

Tuble 10 Current and 110 Jected Water Supply (1117 Fear)							
Water	Supply	2010	2015	2020	2025	2030	2035
Sou	ırces						
Water Purchased from:	Wholesaler Supplied Volume (yes/no)						
NA	No	0	0	0	0	0	0
	-produced ndwater	35,000	35,000	35,000	35,000	35,000	35,000
3 (4)	-produced e Water	0	0	0	0	0	0
Recyle	d Water	0	0	0	0	0	0
To	otal	35,000	35,000	35,000	35,000	35,000	35,000

The Santa Clara Valley Water District reports adequate groundwater conditions in the Santa Clara Valley Groundwater Basin. The basin in not in a condition of overdraft, but is often in a condition that produces artesian conditions due to excessive upward pressure caused by abundant groundwater. The operational storage capacity of the Santa Clara Valley Groundwater Basin is estimated to be 350,000 Acre-Feet (AF).

B. Wholesale Supplies

Great Oaks does not obtain wholesale water from any agency. Table 17 shows projected wholesale supplies during the time period covered by this UWMP.

Table 17 – Projected Wholesale Supplies (CCF and MG/Year)

Wholesale Source	2015	2020	2025	2030	2035
NA	0	0	0	0	0

The Santa Clara Valley Water District does offer potable treated surface water for sales at wholesale prices. At present, no connections exist between Great Oaks' water system and the Santa Clara Valley Water District. In the unlikely event Great Oaks would need to supplement its groundwater supplies with potable treated water, Great Oaks would seek approval from the CPUC to purchase such water from the most economical source, which may or may not be the Santa Clara Valley Water District.

C. Groundwater

Tables 18A and 18B show the amount of groundwater Great Oaks has produced from the Santa Clara Valley Groundwater Basin over the past five years.

Table 18A - Groundwater - Volume Produced (AF/Year)

Basin Name	Metered or Unmetered	2006	2007	2008	2009	2010
Santa Clara Valley	Metered	12,548	13,113	13,515	11,943	10,817

Table 18B - Groundwater - Volume Produced (MG/Year)

Basin Name	Metered or Unmetered	2006	2007	2008	2009	2010
Santa Clara Valley	Metered	4,089	4,273	4,404	3,892	3,525
Groundwater a Total wate	AND THE RESERVE AND ADDRESS OF THE RESERVE AND ADDRESS OF THE PARTY OF	100%	100%	100%	100%	100%

Groundwater will remain as Great Oaks' source of water supply through 2035. Tables 19A and 19B show groundwater pumping projections and groundwater as a percentage of total projected supply through 2035.

Table 19A – Groundwater – Volume Projected to be Pumped (AF/Year)

Basin Name	2015	2020	2025	2030	2035
Santa Clara Valley	10,691	10,315	10,126	9,628	9,302
Percent of Total Water Supply	100%	100%	100%	100%	100%

Table 19B - Groundwater - Volume Projected to be Pumped (MG/Year)

Basin Name	2015	2020	2025	2030	2035
Santa Clara Valley	3,482.71	3,361.52	3,220.07	3,136.13	3,031.44
Percent of Total Water Supply	100%	100%	100%	100%	100%

D. Transfers

Great Oaks maintains interties with San Jose Water Company that may serve as a potential source of supply. Great Oaks has no current plans or needs to use these interties for normal system operation. Table 20 confirms this information.

Table 20 - Transfer and Exchange Opportunities

Transfer Agency	Transfer or Exchange	Short Term	Proposed Quantities	Long Term	Proposed Quantities
No current or proposed transfer agreements					

E. Other Water Supply Opportunities

Great Oaks and the City of San Jose have held preliminary discussions regarding the use of recycled water provided by the City of San Jose and delivered by Great Oaks within Great Oaks' service area. Great Oaks has indicated that, under appropriately agreed upon terms and conditions, Great Oaks will actively promote and offer recycled water within its service area. As these discussions were very preliminary, no projections for recycled water delivery are included in this UWMP.

F. Future Water Projects

At present, and under current and foreseeable groundwater conditions, Great Oaks does not have plans to add additional sources of supply. Discussions are underway with the City of San Jose to resolve a service area dispute that may involve Great Oaks' acquisition of water supply assets presently owned by the City. If such an acquisition would take place, Great Oaks' water supply sources would be enhanced, but no estimate is being made regarding the amount of additional water supply that would be acquired.



G. Supply Reliability

For purposes of discussing water supply reliability, Great Oaks will utilize SCVWD's average water year, single dry water year and multiple dry water years in this UWMP. The water years used by Great Oaks in this UWMP are shown in Table 27, below.

Table 27 - Basis of Water Year Data

Water Year Type	Base Year(s)	
Average Water Year	2002	
Single-Dry Water Year	1977	
Multiple-Dry Water Years	1987 - 1991	

Table 28, below, shows the quantity of water Great Oaks received from all sources (groundwater) during the average water year, single dry water year and multiple dry water years. During the 25-year period covered by these water years, Great Oaks' service area population increased considerably from approximately 49,480 in 1977 to approximately 91,060 in 2002. Table 29 lists other factors potentially affecting groundwater supplies.

Table 28 - Supply Reliability - Historic Conditions (AF/Year)

Water Source	Normal Water Year	Single Dry Water Year	Multiple Dry Water Years				
	2002	1977	1987	1988	1989	1990	1991
Groundwater	13,185	7,171	12,145	11,684	9,530	9,861	8,764
Total	13,185	7,171	12,145	11,684	9,530	9,861	8,764
Percent of	Normal Year	54%	92%	87%	72%	75%	66%

Table 29 – Factors Resulting in Supply Inconsistency

Supply	Legal	Environmental	Water Quality	Climatic	Mechanical
Groundwater	Х	X	X	X	X

As indicated previously, the Santa Clara Valley Water District may or may not adequately or properly manage the groundwater in the Santa Clara Valley Groundwater Basin. If not adequately or properly managed, the capacity of several of Great Oaks' groundwater wells may be reduced. In that event, Great Oaks has several options, including: shifting production from wells located in different geographic/hydrologic areas of Great Oaks' service area and purchasing or installing additional groundwater wells in different locations in the Santa Clara Valley Groundwater Basin to replace any loss of water production capacity.



H. Water Quality

Great Oaks complies with extensive water quality sampling and reporting requirements of the California Department of Public Health (DPH). Great Oaks' water quality monitoring plan is updated annually and reported to DPH. Great Oaks' source of water – the Santa Clara Valley Groundwater Basin – is not projected to be affected by any water quality issues during the period of time covered by this UWMP.

Table 30 – Water Quality – Current and Projected Water Supply Impacts

Water Source	Description of Condition	2010	2015	2020	2025	2030	2035
Groundwater	NA	NA	NA	NA	NA	NA	NA

I. Supply and Demand Comparison

Table 31 demonstrates that Great Oaks' water supplies are sufficient to meet demand. Great Oaks' potable water supply and demand for normal water years through 2035 are listed in Table 32, for a single dry year in Table 33 and for multiple dry years in Table 34.

Table 31 - Supply Reliability - Current Water Sources (AF/Year)

Water Supply Source	Normal Water Year	Multiple Dry Water Year Supply			
		2011	2012	2013	
Groundwater	35,000	32,200	30,450	25,200	
Percent of Normal	100%	92%	87%	72%	

Table 32 – Supply and Demand Comparison – Normal Year (AF/Year)

	2015	2020	2025	2030	2035
Supply Totals from Table 16	35,000	35,000	35,000	35,000	35,000
Demand Totals from Table 11A	10,691	10,315	10,126	9,628	9,302
Difference	24,309	24,685	24,874	25,372	25,698
Difference as % of Supply	69.5%	70.5%	71.1%	72.5%	73.4%

Table 33 – Supply and Demand Comparison – Single Dry Year (AF/Year)

	2015	2020	2025	2030	2035
Supply Totals from Table 16	35,000	35,000	35,000	35,000	35,000
Demand Totals from Table 11A	10,691	10,315	10,126	9,628	9,302
Difference	24,309	24,685	24,874	25,372	25,698
Difference as % of Supply	69.5%	70.5%	71.1%	72.5%	73.4%

Table 34 – Supply and Demand Comparison – Multiple Dry Years (AF/Year)

		2015	2020	2025	2030	2035
Multiple	Supply Totals	32,200	32,200	32,200	32,200	32,200
Dry Year	Demand Totals	10,691	10,315	10,126	9,628	9,302
First Year	Difference	21,509	21,885	22,074	22,572	22,898
Supply	Difference as % of Supply	66.8%	68%%	68.6%	70.1%	71.1%
Multiple	Supply Totals	30,450	30,450	30,450	30,450	30,450
Dry Year	Demand Totals	10,691	10,315	10,126	9,628	9,302
Second Year	Difference	19,759	20,135	20,324	20,822	21,148
Supply	Difference as % of Supply	64.9%	66.1%	66.8%	68.4%	69.5%
Multiple	Supply Totals	25,200	25,200	25,200	25,200	25,200
Dry Year	Demand Totals	10,691	10,315	10,126	9,628	9,302
Third Year	Difference	14,509	14,885	15,074	15,572	15,898
Supply	Difference as % of Supply	57.6%	59.1%	59.8%	61.8%	63.1%

In any one dry year, Great Oaks will not need to modify its water supply or demand resources. The same is true for multiple dry years. However, to comply with any mandatory or voluntary water supply restrictions, Great Oaks will implement all required measures to preserve and protect water supplies and to meet demand as necessary.



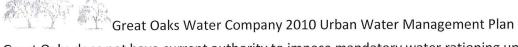


VIII. **Water Supply Shortages**

The Santa Clara Valley Water District Water Shortage Contingency Plan (WSCP) was prepared in 1992. Great Oaks incorporates the WSCP into this UWMP. The following information from SCVWD describes the WSCP.

Stage	Stage Title	Projected Groundwater Reserves	Response	Suggested Reduction In Water Use	Communications And Outreach Efforts
1	Normal	Above 300,000 AF	Continue regular outreach activities to promote ongoing implementation of conservation and implementation of BMPs		Maintain public information and outreach focused on long term, ongoing conservation actions.
2	Alert	250,000 to 300,000 AF	This stage is meant to warn customers that current water use is tapping into groundwater reserves – a signal that groundwater levels are dropping to meet demands. Communications are needed to set the tone for the onset of shortages. Request water users to reduce water use by as much as 10%. Coordinate ordinances with cities and warn and prepare for a stage 3 situation.	0 – 10% demand reduction	Expand on Stage 1 efforts. Intensify public information and advertising campaign. Focus messages on shortage situation and immediate behavioral changes.
3	Severe	200,000 to 250,000 AF	Shortage conditions are worsening, requiring close coordination with retailers and cities to enact ordinances and water use restrictions. Requires significant effort and behavioral change by water users. Increase outreach campaign to save water.	10 – 20% demand reduction	Expand and intensify Stage 2 activities. Further expand outreach efforts. Modify messages to reflect more severe shortage condition and need for immediate behavioral changes.
4	Critical	150,000 to 200,000 AF	This is the most severe stage in a multiyear drought. Encourage retailers and cities to enforce their plans which could include fines for repeated violations.	20 – 40% demand reduction	Strengthen and expand Stage 3 activities. Further expand outreach efforts. Open drought information center.
5	Emergency	Below 150,000 AF	This last stage is meant to address a more immediate crisis such as a major infrastructure failure. Water supply would be available only to meet health and safety needs.	Up to 50% demand reduction	Daily updates on water shortage emergency (media briefings, web update, social media outlets). Activate EOC.

With Great Oaks' groundwater supplies and interties with San Jose Water Company, Great Oaks satisfies SCVWD's request that retailers have at least two different sources of supply. During the most recent drought period of 2007 – 2009, Great Oaks' water supplies remained robust, as water shortages were related to imported water supplies.



Great Oaks does not have current authority to impose mandatory water rationing upon its customers, however, in the event such authority is required, Great Oaks would seek CPUC approval for mandatory rationing as described in Table 35 below. In situations requiring additional conservation efforts, Great Oaks will request that its customers take the actions described in Table 36, below. Great Oaks also does not have the authority to mandate the additional measures listed in Table 36, but may seek CPUC approval should such measures become mandatory.

During the multi-year dry period in the late 1980s to early 1990s, Great Oaks was able to meet rationing goals without the use of penalties or other punitive measures. Working with our customers and praising them for their selfless conservation efforts proved to be highly successful, producing a higher percentage of conservation than neighboring water systems.

Table 35 – Rationing Program

Stage	Stage Name	Water Supply Conditions	% Shortage	Program
1	Normal	Normal	None	NA
2	Alert	Reduction in overall supply	Up to 10%	Voluntary
3	Severe	Significant reduction in source of supply	Up to 20%	Mandatory
4	Critical	Serious reduction in source of supply	Up to 40%	Mandatory
5	Emergency	Critical reduction in source of supply	Up to 50%	Mandatory

Table 36 – Water Shortage Contingency – Additional Prohibitions

Stage	Additional Prohibitions
2	Washing aircraft, vehicles and boats without a positive shutoff nozzle on hose
2	Using water resulting in runoff or flooding of waterways, streets and sidewalks
2	Use of water to wash buildings, structures, sidewalks, patios, driveways and streets
2	Use of water for construction purposes
2	Use of water for outside plants, lawns and landscaping during certain hours
2	Use of water for outside plants, lawns and landscaping without positive hose shutoff
2	Use of water for decorative fountains, lakes or ponds
2	Service of water at restaurants only upon request
3	Coordinate with local agencies to defer installation of new landscaping
4	Ban on all irrigation (except agriculture)

Great Oaks will coordinate its efforts with SCVWD when necessary in order to communicate to the public regarding water shortages and conservation measures. Table 37 describes general outreach efforts Great Oaks will take during water shortage stages.



Table 37 – Consumption Reduction Methods

Stage	Consumption Reduction Method
1	Tiered water rates authorized by CPUC
1	Advise customers of availability of SCVWD water use audits
2	Communicate water conservation information as authorized by CPUC
2	Encourage voluntary conservation efforts
3	Request CPUC authority for additional conservation measures

Great Oaks will request CPUC authority to institute and apply additional consumption reduction methods, as water shortage conditions and the CPUC require. Great Oaks does not currently have authority to impose penalties or charges from CPUC. Great Oaks may not raise water service rates without the approval of the CPUC and Great Oaks cannot estimate the impacts of lost revenue due to future water shortage situations, should they occur.





IX. Conservation and Demand Management Measures

The CPUC has recently authorized Great Oaks to institute tiered water service rates as part of an experimental program ostensibly designed to discourage water demand and produce lower water sales. The CPUC did not make any estimates of anticipated or desired conservation levels when authorizing such rates. At the same time, the CPUC calculated rates upon projected water sales considerably higher than those projected by Great Oaks for the time period from 2010 to 2013. The CPUC's projected water sales for Great Oaks are also considerably higher than Great Oaks' actual water sales in 2010 and Great Oaks' expected water sales for the next three years. Due to these conflicting factors, Great Oaks is unable to estimate water conservation over the next several years and through 2035.

A. Demand Management Measures

Great Oaks' CPUC-authorized tiered rate schedule for general metered service is reproduced below.

Schedule No GENERAL METERE Conservation	<u>D SEKVICE</u> Rates	
Designed and Ordered by the Californi Decisions 10-11-034	a Public Unlitres Commis and 11-02-093	(N)
APPLICABILITY Applicable to all single-family residential services only		(N)
HERRITORY The area is Southeast San Love, East of Snell Road and	South of Hellyer Fark.	
KAILS		
Outputity Parcis (Conservation Pater); For all water delivered, per 180 Cu. H	Per Meier Per Month	(N)
For total monthly usage from 0 to 13.0 Cef.	\$ 1,373	1761
For total monthly usage from 13 J to 32.0 Cel.		(N)
For total monthly usage over 32.1 Ccf.	2 214	(N)
Service Charge (Conservation Rates):		
For 5/8x3/4 inch meter	\$ 7.55	(N)
For 3/4 inch meter	15.10	(N)
For 1 inch meter	22.65	(N)
For E1/2 inch motor	37.74	(N)
For 2 inch meter	60,39	(N) (N)
For 3 inch mater	113.23 188.72	(24)
For 4 inch meter For 6 inch meter	377.44	(N)
For 8 such meter	277.44 223.91	1243
For 10 inch meter	868.12	(10)
Lot 12 inchanger	1.245.57	(34)
For 14 inch meter	1,698 50	(N)
The Service Charge is a readility stortere charge which is to be added the charge for water used comput (Cambrus)	ed at the Quantity Rates	red service and to
Gote mermal to mainly demand by	s T y No to	math Cell (C)
(Determinationally) Amerika Strick Laure No		esas centres Fact FSB 23.2

Great Oaks has not been authorized by the CPUC to incur any conservation expenses without first consulting with the CPUC's Division of Ratepayer Advocates (DRA). One

such consultation has occurred to date and during that consultation DRA declined to respond to Great Oaks' inquiry regarding conservation activities and expenses DRA would approve for Great Oaks. At present, Great Oaks has not been authorized by the CPUC to incur expenses to implement the Best Management Practices of the California Urban Water Conservation Council (CUWCC).

Great Oaks has no funds authorized to engage in additional conservation activities or programs at the present time and likely will not until 2013, when the CPUC next decides how much Great Oaks may spend on conservation-related efforts. Great Oaks will continue to advise its customers of SCVWD's water use audit services as requested by CPUC, while billing its customers pursuant to the tiered rates authorized by the CPUC. In addition, Great Oaks will provide information to the CPUC regarding water sales under the CPUC-authorized tiered rates, as required. At present, it is not known by Great Oaks how the CPUC will determine the effectiveness of the authorized tiered rates, especially in light of Great Oaks' history of declining water sales without tiered rates.

Great Oaks does, however project, based upon historical and current water sales, and without tiered rates authorized by the CPUC, water demand (and therefore water sales) will decline in the coming years, and that Great Oaks will meet water reduction goals established by the California Legislature. Great Oaks expects water demand to decline through 2035, as reported in Table 39, below.

Table 39 – Current and Planned Water Supply with Conservation (AF/Year)

Water Supply Source	2010	2015	2020	2025	2030	2035
Groundwater	11,020	10,560	10,118	9,615	9,289	8,903

B. Compliance

Great Oaks' water conservation efforts and programs are listed and described below. Great Oaks' compliance with the CUWCC and UWMP demand management measures is despite the lack of authorized funding for compliance. The information is also provided in Table 40, below.

- Interior and Exterior Water Audits for Single Family and Multi-Family Customers:
 Great Oaks advises residential customers regarding SCVWD's free water auditing
 services. SCVWD communicates with Great Oaks' customers directly through print,
 television, movie screen and radio advertising. SCVWD provides customers
 participating in SCVWD's water auditing services, and Great Oaks, receive a report
 upon completion.
- 2. <u>Plumbing Retrofit</u>: Great Oaks distributes sink faucet aerators and, when available, low-flow showerheads, provided by SCVWD.



- 3. <u>Distribution System Water Audits, Leak Detection and Repair</u>: Great Oaks constantly monitors its distribution system for leaks, resulting in an uncommonly low 4.4 unaccounted for water percentage.
- 4. Metering with Commodity Rates: All of Great Oaks' accounts are metered.
- 5. <u>Large Landscape Water Audits and Incentives</u>: SCVWD provides irrigation surveys for large landscape customers.
- 6. <u>Landscape Water Conservation Requirements</u>: Most of Great Oaks' service area is within the City of San Jose, which has landscape water conservation requirements for new construction.
- 7. <u>Public Information</u>: SCVWD distributes public information to Great Oaks' customers through its media and outreach programs. Great Oaks' water bills provide year-to-year consumption comparisons alerting customers to any changes in usage patterns.
- 8. <u>School Education</u>: On occasion, Great Oaks provides information to schools within its service area for use in discussing and promoting water conservation and water quality.
- 9. <u>Commercial and Industrial Water Conservation</u>: SCVWD makes water use audits available to commercial and industrial accounts in Great Oaks' service area upon request.
- 10. New Commercial and Industrial Water Use Review: The City of San Jose Building Department and Great Oaks coordinate activities for new commercial and industrial water uses. Great Oaks provides the City of San Jose (or the County of Santa Clara) with a "will serve letter," representing that Great Oaks has reviewed the new construction plans and agrees with the proposed water use of the new commercial or industrial customer.
- 11. <u>Conservation Pricing, Water Service and Sewer Service</u>: Great Oaks has been authorized to implement tiered water pricing for single-family residential customers, and has implemented such tiered water rates.
- 12. <u>Landscape Water Conservation for New and Existing Single-Family Homes</u>: See discussion for number 6, above. In addition, the City of San Jose maintains a demonstration garden and works with landscape maintenance companies to promote efficient landscaping practices within Great Oaks' service area.
- 13. <u>Water Waste Prohibition</u>: Great Oaks prohibits water waste under CPUC rules and regulations. Great Oaks is authorized to discontinue service to any customer wasting water.
- 14. <u>Water Conservation Coordinator</u>: Great Oaks has not been authorized funding for a water conservation coordinator. Great Oaks' customer service personnel provide water conservation information when time permits.
- 15. <u>Financial Incentives</u>: Tiered water rates authorized by the CPUC may provide financial incentives or disincentives to single-family residential customers of Great Oaks, although the extent of such incentives or disincentives is unknown.

16. <u>Ultra-low Flush Toilet Replacement</u>: Great Oaks' customers may participate in the SCVWD program for ultra-low flush toilet replacement.

Table 40 – Demand Management Measures and CUWCC BMPs

				JWMP Demand	GOWC	T
	CUWCC	BMPs		agement Measures	Existing	Compliance
Category	ВМР	BMP Name	DMM	DMM Name	Program	by
	1.1.1	Conservation Coordinator	L	Water Conservation Coordinator	No	
	1.1.2	Water Waste Prevention	М	Water Waste Prohibition	Yes	GOWC
	1.1.3	Wholesale Agency Assistance Programs	J	Wholesale Agency Programs	Yes	SCVWD
Operations	1.2	Water Loss Control	J	System Water audits, leak detection and repair	Yes	GOWC
	1.3	Metering with Commodity Rates For all New Connections & Retrofit of Existing Connections	D	Metering with commodity rates for all new connections and retrofit of existing connections	Yes	GOWC
	1.4	Retail Conservation Pricing	К	Conservation Pricing	Yes	GOWC
Education	2.1	Public Information Programs	G	Public Information Programs	Yes	GOWC SCVWD
Education	2.2	School Education Programs	Н	School Education Programs	Yes	GOWC SCVWD
	3.1	Residential Assistance Programs	А	Water survey programs for single- family residential and multifamily residential	Yes	GOWC SCVWD
			В	Residential plumbing retrofit	Yes	GOWC SCVWD
Residential	3.2	Landscape water survey	А	Water survey programs for single-family residential and multifamily residential customers	Yes	GOWC SCVWD
	3.3	High-efficiency clothes washing machine financia! incentive programs	F	High-efficiency washing machine rebate programs	Yes	SCVWD
	3.4	WaterSense Specification (WSS) Toilets	N	Residential ultra-low- flush toilet replacement program	Yes	SCVWD



Table 40 - Continued

CII	4	CII	1	Conservation programs for CII accounts	Yes	CSJ SCVWD
Landscape	5	Landscape	E	Large landscape conservation programs and incentives	Yes	CSJ SCVWD





Appendix



April 26, 2011

P. O. Box 23490 San Jose, California 95153 (408) 227-9540

San Jose Water Company Office of Regulatory Affairs 110 West Taylor Street San Jose, CA 95156

RE: NOTICE OF PREPARATION OF URBAN WATER MANAGEMENT PLAN

Dear Sir or Madam:

Great Oaks Water Company (Great Oaks) is updating its Urban Water Management Plan as required under the relevant provisions of the California Water Code. Revisions to Great Oaks' 2005 Urban Water Management Plan are being made and San Jose Water Company is invited to participate in this process.

Great Oaks will make proposed revisions to its 2005 Urban Water Management Plan available for public review and will hold a public meeting in June of this year. In the meantime, if you have any questions, please contact the undersigned.

Great Oaks Water Company

Timothy S. Guster



April 26, 2011

P. O. Box 23490 San Jose, California 95153 (408) 227-9540

Santa Clara Valley Water District Attention: James O'Brien 5750 Almaden Expressway San Jose, CA 95118

RE: NOTICE OF PREPARATION OF URBAN WATER MANAGEMENT PLAN

Dear Mr. O'Brien:

Great Oaks Water Company (Great Oaks) is updating its Urban Water Management Plan as required under the relevant provisions of the California Water Code. Revisions to Great Oaks' 2005 Urban Water Management Plan are being made and the Santa Clara Valley Water District is invited to participate in this process.

Great Oaks will make proposed revisions to its 2005 Urban Water Management Plan available for public review and will hold a public meeting in June of this year. In the meantime, if you have any questions, please contact the undersigned.

Great Oaks Water Company Jimstlu Hants

Timothy S. Guster



April 26, 2011

P. O. Box 23490 San Jose, California 95153 (408) 227-9540

City of San Jose Environmental Services Department Attention: Mansour M. Nasser, P.E. Deputy Director 3025 Tuers Road San Jose, CA 95121

RE: NOTICE OF PREPARATION OF URBAN WATER MANAGEMENT PLAN

Dear Mr. Nasser:

Great Oaks Water Company (Great Oaks) is updating its Urban Water Management Plan as required under the relevant provisions of the California Water Code. Revisions to Great Oaks` 2005 Urban Water Management Plan are being made and the City of San Jose is invited to participate in this process.

Great Oaks will make proposed revisions to its 2005 Urban Water Management Plan available for public review and will hold a public meeting in June of this year. In the meantime, if you have any questions, please contact the undersigned.

Great Oaks Water Company

Timothy S. Guster



April 26, 2011

P. O. Box 23490 San Jose, California 95153 (408) 227-9540

Jody Hall Esser Planning and Development Department Director County of Santa Clara 70 West Hedding San Jose, CA 95110

RE: NOTICE OF PREPARATION OF URBAN WATER MANAGEMENT PLAN

Dear Ms. Esser:

Great Oaks Water Company (Great Oaks) is updating its Urban Water Management Plan as required under the relevant provisions of the California Water Code. Revisions to Great Oaks' 2005 Urban Water Management Plan are being made and the County of Santa Clara is invited to participate in this process.

Great Oaks will make proposed revisions to its 2005 Urban Water Management Plan available for public review and will hold a public meeting in June of this year. In the meantime, if you have any questions, please contact the undersigned.

Great Oaks Water Company

Timothy S. Guster

San Jose Mercury News

750 RIDDER PARK DRIVE SAN JOSE, CALIFORNIA 95190 408-920-5332

PROOF OF PUBLICATION

IN THE
CITY OF SAN JOSE
STATE OF CALIFORNIA
COUNTY OF SANTA CLARA

GREAT OAKS WATER CO POST OFFICE BOX 23490 SAN JOSE CA 95153-0000

FILE NO. T. Guster

In the matter of

The San Jose Mercury News

The undersigned, being first duly sworn, deposes and says: That at all times hereinafter mentioned affiant was and still is a citizen of the United States, over the age of eighteen years, and not a party to or interested in the above entitled proceedings; and was at and during all said times and still is the principal clerk of the printer and publisher of the San Jose Mercury News, a newspaper of general circulation printed and published daily in the city of San Jose in said County of Santa Clara, State of California as determined by the court's decree dated June 27, 1952, case numbers 84096 and 84097, and that said San Jose Mercury News is and was at all times herein mentioned a newspaper of general circulation as that term is defined by Sections 6000 and following, of the Government Code of the State of California and, as provided by said sections, is published for the dissemination of local or telegraphic news and intelligence of a general character, having a bona fide subscription list of paying subscribers, and is not devoted to the interests or published for the entertainment or instruction of a particular class, professional, trade, calling, race or denomination, or for the entertainment and instruction of any number of such classes, professionals, trades, callings, races or denominations; that at all times said newspaper has been established, printed and published in the said city of San Jose in said County and State at regular intervals for more than one year preceding the first publication of the notice herein mentioned. Said decree has not been revoked, vacated or set aside.

I declare that the notice, of which the annexed is a true printed copy, has been published in each regular or entire issue of said newspaper and not in any supplement thereof on the following dates, to wit:

4/29/2011, 5/6/2011

Dated at San Jose, California 05/06/11

I declare under penalty of perjury that the foregoing is true and correct

Signed This Chris

Principal clerk of the printer and publisher of the San Jose Mercury News.

Legal No.

0003975950

NOTICE OF PUBLIC HEARING

Great Oaks Water Company Urban Water Management Plan Update June 30, 2011 2:00 p.m.

Great Oaks Water Company (Great Oaks) is in the process of updating its existing Urban Water Management Plan (UWMP) and is seeking public input.

Under the Urban Water Management Act, urban water suppliers are required to report, describe and evaluate water deliveries and uses, water supply sources, efficient water uses and demand management measures, including implementation strategy and schedule. In addition, the Water Conservation Bill of 2009 requires urban water suppliers to report their base daily per capita water use, urban water use target, interim urban water use target and compliance daily per capita water use.

A public hearing will be held on Thursday, June 30, 2011 at 2:00 p.m. at Great Oaks' offices located at 20 Great Oaks Boulevard, Suite 120, San Jose, California 95119 to receive public input on Great Oaks' draft UWMP. The draft UWMP is available for viewing at Great Oaks' website (www.greatoakswater.com) and at Great Oaks' offices.

SJMN#3975950

April 29,May 6, 2011

UNANIMOUS WRITTEN CONSENT OF DIRECTORS TO CORPORATE ACTION

We, John W.S. Roeder, Adele Wilson and Timothy S. Guster are all members of, and together constitute, the Board of Directors of Great Oaks Water Company ("corporation"), and by this writing approve the following resolution and consent to its adoption:

Resolved, Great Oaks Water Company Urban Water Management Plan 2010 (UWMP 2010) attached hereto as Exhibit 1 is approved and adopted. Timothy S. Guster is authorized to submit the UWMP 2010 according to statutory requirements.

This consent is executed pursuant to subdivision (b) of Section 307 of the California Corporations Code and is to be filed with the minutes of Board proceedings of the corporation.

Dated: June 30, 2011

Dated: June 30, 2011

Dated: June 30, 2011

John W.S. Ryeder

Adele Wilson

Timothy & Guster